

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re: )  
)  
)  
Willie Surgeon Jr., )  
) Case No. 14-43393-399  
) Chapter 13  
Debtor, )  
) Debtor's Answer to Motion  
) to Dismiss  
JOHN V. LABARGE, JR. Trustee, )  
)  
Movant, )  
VS. )  
Willie Surgeon Jr., )  
)  
Respondent. )  
)

**DEBTOR'S ANSWER TO MOTION TO DISMISS**

Comes now Debtor, Willie Surgeon, Jr., by and through his attorney, and answers the Trustee's Motion to dismiss, as follows:

1. Debtor admits each and every allegation contained in paragraph 1.

2. Debtor admits each and every allegation contained in paragraph 2.

3. Debtor is without sufficient information to either admit or deny each and every allegation contained in paragraph 3.

4. Debtor is without sufficient information to either admit or deny each and every allegation contained in paragraph 4.

5. Debtor denies each and every allegation contained in paragraph 5.

WHEREFORE, Debtor prays the Court deny the Trustee's Motion to Dismiss and for such other relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED,

CASTLE LAW OF ST. LOUIS, P.C.

\_\_\_\_/s/James R. Brown\_\_\_\_\_  
James R. Brown, 42100MO  
500 N. Broadway, Ste. 1400  
St. Louis, MO 63102  
(314)436-3300  
(314) 241-7889 Fax  
EDMO@castlelaw.net

**PROOF OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing Debtor's Answer to Motion to Dismiss, was mailed to all parties, WHO HAVE NOT BEEN ELECTRONICALLY NOTIFIED, including Debtor this 10th day of October 2014 John V. LaBarge, Jr., was electronically notified.

/s/ Angela Pennington

John V. LaBarge, Jr.-via ECF only  
Standing Trustee  
P.O. Box 430908  
St. Louis, MO 63143

Willie Surgeon Jr.  
1432 Glenmeade Dr.  
Maryland Heights, MO 63043